

IN THE COURT OF APPEALS
TENTH DISTRICT OF TEXAS
WACO, TEXAS

FILED IN
10th COURT OF APPEALS
WACO, TEXAS
9/12/2019 1:00:00 PM
NITA WHITENER
Clerk

IJAH IWASEY BALTIMORE

§
§
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§
§

v.

DOCKET NO. 10-19-00196-CR

STATE OF TEXAS

APPELLANT'S FIRST MOTION
FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF

TO THE HONORABLE COURT OF APPEALS:

Appellant, by and through his attorney of record, Jessica S. Freud, respectfully moves the Court to extend the time for filing Appellant's brief in this cause, and in support therefore would show this Court as follows:

I.

Following a jury trial in trial court cause number 2017-449-C2 in McLennan County's 54th District Court, a jury found Mr. Baltimore guilty of unlawful carrying of a weapon on a premises licensed or issued a permit for the sale of alcohol, a third degree felony under Texas Penal Code 46.02. The jury sentenced Mr. Baltimore to 4 years in the Texas Department of Criminal Justice Institutional Division and recommended that the trial court suspend imposition of that sentence (C.R. 70). Following the recommendation of the jury, the trial court suspended imposition of sentence and ordered Mr. Baltimore be placed on community supervision for a period of 4 years (*id.*). A notice of appeal was timely filed in the trial court (C.R. 83).

II.

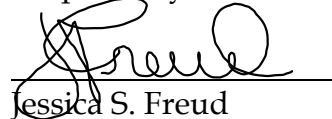
Appellant's brief is due tomorrow, September 13, 2019. Counsel has completed the review of the clerk's record, and has begun reading the reporter's record but still needs additional time to complete that review and then research and prepare Appellant's brief.

As a matter of office policy, it is counsel's understanding that the State does not oppose Appellant's first two motion for extension of time. It is with this understanding that counsel represents to this Court that the State does not oppose this motion. This Motion is not made for the purpose of delay.

III.

FOR THESE REAONS, Counsel for Appellant respectfully requests this Court grant this first request for extension of time to file Appellant's brief and set a due date of 30 days from the date Appellant's brief is due.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Freud', is written over a horizontal line.

Jessica S. Freud

Freud Law P.C.

100 N. 6th Street, Suite 902

Waco, Texas 76701

Phone: (254) 307-3384

Fax: (877) 726-4411

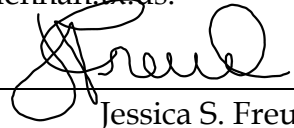
State Bar No. 24095303

Email: Jessi@FreudLaw.com

Attorney for Appellant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Motion has been served on the District Attorney for McLennan County, Texas, on September 12, 2019, to Sterling.Harmon@co.mclennan.tx.us and/or Gabriel.Price@co.mclennan.tx.us.

A handwritten signature in black ink, appearing to read "Freud", is written over a horizontal line.

Jessica S. Freud